

Post Office Box 1787 • Olympia, WA 98507-1787 • 360-352-0514 • FAX 360-352-4579

August 12, 2005

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504-2400

RE: Limits on wagers in card games - Poker: WAC 230-40-120(1)(c)

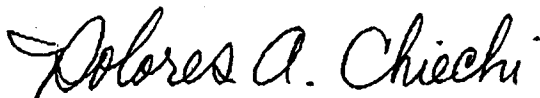
Dear Commissioners Ludwig, Parker, and Niemi & Ellis:

On behalf of our members, we submit the enclosed petition for rule change to amend WAC 230-40-120(1)(c). The requested change would allow licensees authorized to conduct house-banked and non-house banked games to offer one-hundred dollar wager limits on poker games.

We look forward to being provided the opportunity to present arguments on this issue.

Thank you in advance for your consideration of this request.

Sincerely,



Dolores A. Chiechi
Executive Director

Attachments

Susan Arland

From: Dolores Chiechi [dolores@rga-wa.org]
Sent: Tuesday, August 16, 2005 9:41 AM
To: Beth Heston
Cc: Susan Arland; Cally Cass
Subject: RE: Petitions for Rules Changes FAXED
Attachments: WAC 230 40 120(1)(c).doc

Beth,

Thank you for your response and willingness to keep us apprised on staff's progress in reviewing RGA's petitions.

Regarding the issue with WAC 230-40-120(1)(c) the desired change is reflected in underlined language (attached), specifically: "...except that licensees authorized to conduct house-banked card games shall not exceed one-hundred dollars;"

The intention is to authorize only those licensees that operate BOTH poker and HB games to offer \$100 limits on poker. If the change submitted would not have this effect, your assistance in revising the language is most appreciated.

Our Rules Team meets this Friday at 10:00 am. Any response or feedback received prior to then would prove useful in our continued discussions. Thank you for your consideration.

Dolores A. Chiechi
Executive Director
Recreational Gaming Association
PO Box 1787
Olympia, WA 98507-1787
(360) 352-0514 office
(360) 352-4579 fax
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Post Office Box 1787 • Olympia, WA 98507-1787 • 360-352-0514 • FAX 360-352-4579

August 23, 2005

Washington State Gambling Commission
PO Box 42400
Olympia, WA 98504-2400

RE: Limits on wagers in card games - Poker: WAC 230-40-120(1)(c)

Dear Commissioners Ludwig, Parker, and Niemi & Ellis:

On behalf of our members, we submitted a petition for rule change to amend WAC 230-40-120(1)(c). The requested change would allow licensees authorized to conduct house-banked and non-house banked games to offer one-hundred dollar wager limits on poker games.

As mentioned in our filing, we look forward to being provided the opportunity to elaborate on the following arguments as they relate to our request:

- ✓ Only allowed in house-banked environments where security and surveillance requirements are already in place;
- ✓ Player/market demands for increased betting limits;
- ✓ Redirecting wagering in legal venues versus Internet gambling;
- ✓ No increased revenue to the house;
- ✓ There has been no adjustment since 1980's, and
- ✓ Diminished value of the present dollar.

We appreciate your consideration and thank you in advance for the opportunity to present more information on this issue over the next few months.

Sincerely,

Dolores A. Chiechi
Executive Director